

J&J SPORTS PRODUCTIONS, INC.,

Plaintiff,

v.

JOSE M. BONILLA, indiv. and d/b/a LOS
ARCOS DE JALISCO, INC. d/b/a LOS ARCOS
TAQUERIA #3, and LOS ARCOS DE
JALISCO, INC. d/b/a LOS ARCOS TAQUERIA
#3,

Defendants.

Case No. 2011-cv-7681

NOW COMES the Plaintiff, J&J SPORTS PRODUCTIONS, INC., by its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., respectfully requests that this Honorable Court enter judgment against the Defendant, JOSE M. BONILLA, pursuant to the terms of the settlement and in support thereof, states as follows:

- 1

5. As of the date of the filing of this motion Defendant has failed to make any payments pursuant to the Settlement Agreement.

6. That Plaintiff is further entitled to One Thousand Nine Hundred Ninety and 25/100 (\$1,990.25.00) Dollars for attorney's fees and costs. See Affidavit of Plaintiff's Counsel, Andre Ordeanu, (attached hereto and made a part hereof, as Plaintiff's Exhibit "B").

WHEREFORE, the Plaintiff, J&J SPORTS PRODUCTIONS, INC., respectfully prays this Honorable Court grant Plaintiff's Motion to Enforce the Settlement Agreement in an amount of Six Thousand and No/100 (\$6,000.00), plus Three Thousand (\$3,000.00) in a default penalty and attorney's fees and costs in the amount of One Thousand Nine Hundred Ninety and 25/100 (\$1,990.25) Dollars, for a total Judgment in the amount of Ten Thousand Nine Hundred Ninety and 25/100 (\$10,990.25) and for such other relief for Plaintiff as this Court deems just and right.

s/ Andre Ordeanu
Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on June 12, 2012, using the CM/ECF system as well as mailed to the Defendants via Certified and Regular mail. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu
Andre Ordeanu

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